

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

NATHAN CHRISTIAN,

Plaintiff,

~ versus ~

LOYAKK, INC, *et al.*

Defendants.

Case No. 1:22-cv-00215

**AFFIDAVIT IN SUPPORT
BY DEFENDANT SADIQ QUASIM**

THE UNITED KINGDOM

)
) ss.
)

The Undersigned, **Sadiq Quasim**, a natural person over the age of 18 respectfully states the following to be true and accurate to the best of their knowledge, under penalty of perjury.

A. Introduction

1. My name is Sadiq Quasim and I am personally named as a Defendant in the above-captioned matter.

2. I understand that my Wyoming counsel is filing a Reply Memorandum in Further Support of the Motion to Dismiss the Complaint that I have filed in the above-captioned matter.

Lu

S. Quasim

3. I further understand that this Affidavit is to be submitted to the Court for the narrow purpose of describing the amount in controversy between the Parties – and specifically, the valuation of the Loyakk token float in 2018.

4. This Affidavit does not address the substance of the claims in the Verified Complaint and the underlying case, and nothing in this Affidavit should be deemed an admission to any allegations in the Complaint.

5. Of course, to the extent that supplemental information or my testimony may be valuable to the Court in deciding this Motion to Dismiss – and in particular the success (or lack thereof) of the Loyakk token float in 2018 – I remain ready, willing and able to supplement this Affidavit as appropriate.

B. The Loyakk Float


6. The Loyakk Initial Coin Offering in 2018 was a complete failure.

7. According to my records, the amount raised was forty-eight thousand six hundred and thirty United States dollars and thirty-three cents \$48,630.33.

8. This can be verified by the blockchain which shows 92 ETH & 2 BTC total purchases all of which were ultimately deposited in Loyakk's wallets at:

ETH - 0x2638d8c3a71fe0771bf29b75617e41a160ed9318

BTC - 14nyFkVJHHBGR7bYioWn6BxjppMjT3KA1r

 S. Quasin

Address: 0x263d8c3a71fe0771bf29b75617e41a160ed9318

Etherscan API - End-of-Year Sales: Get extra 15% off (one time) for any new API Pro subscription. [Sign-up Now!](#)

Overview: Balance: 0.000294175589225592 Ether, Ether Value: \$0.35 (at \$1196.33/ETH)

More Info: My Name Tag: Not Available (login to update)

GET 200% WELCOME BONUS OF UP TO 2 ETH Stake **CLAIM NOW** T&CS APPLY

Transactions: 17 Latest, 25 from a total of 92 transactions.

Txn Hash	Method	Block	Age	From	To	Value	Txn
0x78889Aca5276cb49bb	Transfer	7126901	1423 days 8 hrs ago	0x263d8c3a71fe0771bf	0x5ad526a1c0b0949423c	0.0195307 Ether	Link

ETH transaction available at:

<https://etherscan.io/address/0x263d8c3a71fe0771bf29b75617e41a160ed9318>

Blockchain.com Search Blockchain, Transactions, Addresses and Blocks

14nyF-3KA1r

14nyFkVJHHBGR7bYioWn6BxjppMjT3KA1r

This address has transacted 4 times on the Bitcoin blockchain. It has received a total of 0.72015000 BTC (\$12,060.40) and has sent a total of 0.72015000 BTC (\$12,060.40). The current value of this address is 0.00000000 BTC (\$0.00).

Balance: \$0.00 0.00000000 BTC

Total Received	Total Sent
0.72015000 BTC (\$12,060.40)	0.72015000 BTC (\$12,060.40)
Total Volume	Transactions
1.44030000 BTC (\$24,120.80)	4

Transactions

BTC transactions available at:

<https://www.blockchain.com/explorer/addresses/btc/14nyFkVJHHBGR7bYioWn6BxjppMjT3KA1r>

9. The claim in the blogpost submitted by the Plaintiff is entirely unmoored from reality. At no time did the ICO float raise the alleged millions of dollars claimed in that article.

Lu

S. Quasim

10. For this reason, even giving the Plaintiff every benefit of the doubt (and even assuming that a non-tradeable token has *any* value), the sole valuation of 0.5% of the float would be two hundred and forty-three United States dollars and fifteen cents (\$243.15)


C. Clarification of Prior Affidavit

11. The earlier Affidavit I submitted in this matter at Docket Entry no. 17 (filed on November 30, 2022). That Affidavit claimed that “I reside in the United Kingdom and have resided in California during all times relevant to this Complaint.” What I meant to say was: “I reside in the United Kingdom and have resided in the United Kingdom during all times relevant to this Complaint” – the reference to California in the earlier Affidavit was a scriveners error.

D. Conclusion

12. For these reasons, I respectfully submit that the valuation of the ICO float that Plaintiff claims is either worth nothing (because there was never any secondary market) or if valued based on the original ICO, it was worth two hundred and forty-three United States dollars and fifteen cents (\$243.15)

RESPECTFULLY SUBMITTED this 19th day of December, 2022



Sadiq Quasim

Sworn by Sadiq Quasim before me Susan Anand
Notary Public on this Nineteenth day of
December Two Thousand and Twenty Two at 41
Westbury Road Northwood Middlesex HA6
3DB.



Susan Anand Notary Public
41 Westbury Road
Northwood, Middlesex HA6 3DB
Tel: 07958 088 690
susan@london-notary.com

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